

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALIBABA GROUP HOLDING LIMITED, :

Plaintiff(s), :

v. :

ALIBABACoin FOUNDATION a/k/a ABBC :
FOUNDATION, ABBC BLOCK CHAIN IT :
SOLUTIONS LLC, ALIBABACoin :
GENERAL TRADING FZE, ALIBABACoin :
FOUNDATION LLC, JASON DANIEL PAUL :
PHILIP, HASAN ABBAS, :

Defendant(s). :

Case No.: 18-cv-02897- JPO

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**NOTICE OF MOTION FOR LEAVE TO WITHDRAW AS COUNSEL AND MOTION
TO EXTEND DEADLINES FOR EXPEDITED JURISDICTIONAL DISCOVERY**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Anne C. Lefever, dated May 25, 2018, counsel will move this Court before the Honorable Paul J. Oetken, at the United States District Court for the Southern District of New York, 40 Foley Square 500 Pearl Street, New York 10007, pursuant to Local Rule 1.4, for leave by Anne C. Lefever, William P. Atkins and Pillsbury Winthrop Shaw Pittman LLP to withdraw as counsel for Defendants Alibabacoin Foundation a/k/a ABBC Foundation, ABBC Block Chain IT Solutions LLC, Alibabacoin General Trading FZE, Alibabacoin Foundation LLC, and Jason Daniel Paul Philip, and pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4), for an order extending the deadlines for expedited jurisdictional discovery by 30 days.

New York, New York
Dated: May 25, 2018

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP

/s/ Anne C. Lefever

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Foundation LLC, and Jason Daniel Paul
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